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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR 08-0160 SI
)	Case No: 07 90552 MISC VRW (JCS)
Plaintiff,)	
)	STIPULATION AND Proposed ORDER
v.)	RE: RULE 15 DEPOSITIONS
)	
JOHN JOSEPH COTA, and)	
FLEET MANEGMENT LIMITED,)	
)	
Defendants)	
)	
)	

1 The parties hereby stipulate to the following schedule regarding the Rule 15
2 depositions:

3 1. As soon as practicable but no later than October 20, 2008, the parties meet and
4 confer on a final transcript of any portion of the VDR to be used during the depositions.

5 2. By October 17, 2008, the Government will provide to the defense a copy of an
6 exhibit list and the exhibits it plans to use at the depositions.

7 3. By October 23, 2008, the defense will provide to the government a copy of an
8 exhibit list and the exhibits it plans to use at the depositions.

9 4. The proposed order of witnesses is the following: Bosun, Helmsman, Third
10 Officer, Chief Officer, Second Officer and Master. The deposition of the Bosun and
11 Helmsman will start on October 27, 2008 and will run consecutively with a day break
12 between witnesses. The deposition of the Third Officer, Chief Officer, and Second
13 Officer will begin on November 17, 2008, and run consecutively with a day break
14 between witnesses. The deposition of the Master will begin on December 2, 2008, or
15 after the depositions of the other witnesses is complete, whichever is later. There will be
16 no depositions on November 26, 27 and 28, 2008. The government reserves the right to
17 change the order of the Third Officer, Chief Officer and Second Officer, with at least 48

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1 hours notice to the parties.

2 Respectfully submitted

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4 JOSEPH P. RUSSONIELLO
5 United States Attorney
6 BRIAN J. STRETCH
7 Chief, Criminal Division

8 By /s/
9 MARC C. GREENBEG
10 Attorney for Fleet Management Limited

11 By: /s/
12 JONATHAN SCHMIDT
13 Assistant United States Attorney

14 By /s/
15 JEFFERY L. BORNSTEIN
16 Attorney for John Joseph Cota

17 IT IS SO ORDERED.

18 Dated: October 8, 2008

19 
20 JOSEPH C. SPERO
21 United States Magistrate Judge